



P.O. BOX 2166 • SAVANNAH, GA 31402 • TEL. (912) 232-0211 • FAX (912) 233-2150
6002 Commerce Blvd Suite 115 • Garden City GA 31408 • <http://johnsjames.com>

CUSTOM HOUSE BROKER
TREAS. DEPT. LICENSE NO. 5611
INTERNATIONAL FREIGHT FORWARDER
FMC LIC. 0150-F
AIR CARGO AGENT
CHARTER BROKER

May 21, 2015

BEFORE THE
FEDERAL MARITIME COMMISSION

DOCKET NO. P2-15

PETITION OF THE NATIONAL CUSTOMS BROKERS AND
FORWARDERS ASSOCIATION OF AMERICA, INC. FOR INTIATION
OF RULEMAKING

I am Janet B. Fields, Corporate Manager at John S. James Co., FMC license number 0150-F. John S James Co. has offices in six locations in the southeastern region of the United States. We are also a member of a global organization with offices in thirty-three countries.

Our company fully supports the petition from the NCBFAA to eliminate NSAs and expand the use of NRAs for the simple reason that having two systems when one would suffice, is overly burdensome and confusing to our industry.

We support clarification of Negotiated Rate Arrangements.

Sincerely,
Janet B. Fields
Corporate Manager



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NOTE: All comments must be filed no later than June 8, 2015. Anyone filing comments should file an original and 5 copies with the Secretary, Federal Maritime Commission; 800 North Capitol Street, NW; Washington, DC 20573-0001. Alternatively, the comments can be filed electronically with Secretary@fmc.gov. In either event, please send a copy to Ed Greenberg; GKG LAW P.C.; 1055 Thomas Jefferson Street, NW; Suite 500; Washington, DC 20007.